

1 Q. Okay. Did you ever -- other than general
2 knowledge you had, for purposes of this application, did
3 you ever do any independent investigation of the New
4 Albany market or the Louisville market?

5 A. No.

6 Q. Okay. What was the next event that happened
7 after Mr. Thompson provided you with the filing window
8 and the price quote for his services?

9 A. He said he would take care of the engineer and
10 he would -- he had an attorney he would refer us to in

11 return for the \$2450 and that he would not the

1 Q. Okay. Now, there are certain -- there's a
2 typed letter and then there are certain handwritten
3 notations that are made on the letter; correct?

4 A. Correct.

5 Q. Whose handwriting?

6 A. That's mine.

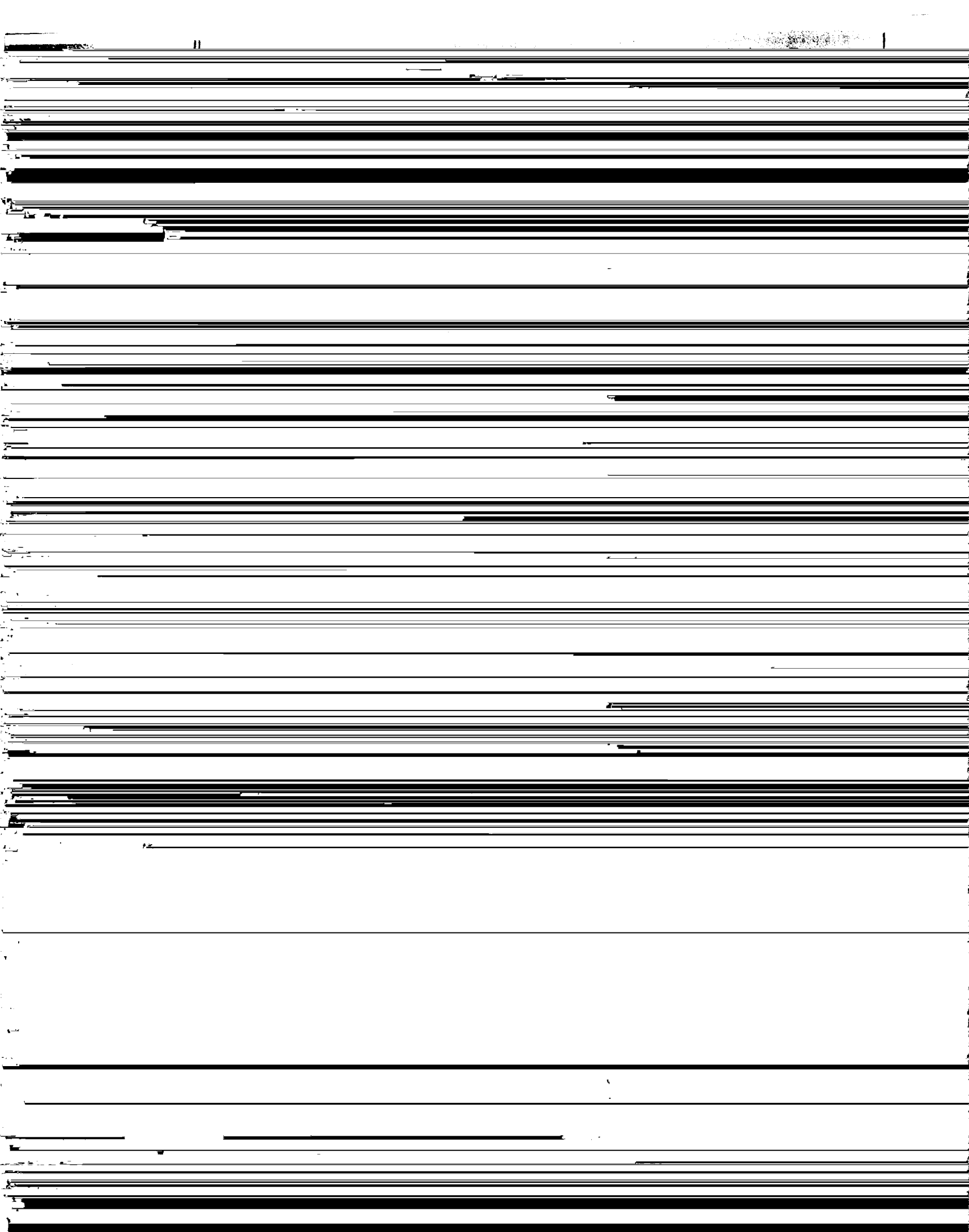
7 Q. Okay. Did you send Mr. Gainey a copy of this
8 letter with the handwritten notations?

9 A. Yes. Mr. Gainey is not familiar with the FCC
10 language or practices. So he did not know how to write
11 the letter. And I told him that there was some language
12 that had to be inserted in the letter that would satisfy
13 the FCC requirements, and he says, "Where do I get
14 that?" So I said, "I've got a copy of another letter
15 here that was used on a similar application. I'll send
16 that down to you." So I faxed this down to him.

17 Q. Now, did you ever have a discussion with Mr.
18 Gainey as to what the terms of the loan -- as to what
19 the repayment terms of the loan would be with him?

20 A. Yes, I did.

21 Q. Okay.



1 that correct?

2 A. Yes.

3 Q. All right. Had you gotten the copy of that
4 letter before you received it from Mr. Ramsey?

5 A. No.

6 Q. Okay. Look again, please, at section three of
7 your application, which is page six, the financial
8 certification. Did you authorize a yes answer to
9 question one in section three?

10 A. Where are we?

11 Q. Page six, that's it. Did you authorize that
12 answer to be yes to question one?

13 A. Yes.

14 Q. All right. Now, did you authorize the
15 insertion in question two of the dollar amount that
16 appears there?

17 A. Yes.

18 Q. And what is that dollar amount?

19 A. \$416,303.79.

20 Q. All right. And did you authorize the
21 inclusion of the information and response to question

1 three, that is the reference to the Home Federal Trust
2 Bank of Georgia?

3 A. Yes.

4 Q. All right. Now, in certifying -- in Section
5 three, in certifying to Staton's financial communication
6 -- qualifications, what documents, if any, did you have
7 before you or did you refer to?

1 A. Well, to operate the station, I had come up
2 with X amount of employees and salaries, a total list of
3 everything from payroll to insurance to utilities to
4 come up with that figure, plus the figure for the
5 direction of the tower.

6 So there was a separate figure for

1 receive a copy of Mr. Ramsey's personal financial
2 statement?

3 A. No.

4 Q. Did you receive a copy of his statement of
5 finances after you signed the application?

6 A. No.

7 Q. Now, Mr. W. A. Gainey, he's the banker, is he
8 not?

9 A. Right.

10 Q. Okay. Did you ever provide Mr. Gainey with a
11 copy of your financial statement?

12 A. No.

13 Q. Did you ever have any conversations with Mr.
14 Gainey?

15 A. No.

16 Q. Did you ever have any communications with him
17 other than the letter?

18 A. No.

19 Q. Did you ever send him anything?

20 A. No.

21 Q. I'd like to refer you to your stock

Attachment 5

SECTION III - FINANCIAL QUALIFICATIONS

NOTE If this application is for a change in an operating facility do not fill out this section.

1. The applicant certifies that sufficient net liquid assets are on hand or that sufficient funds are available from committed sources to construct and operate the requested facilities for three months without revenue.

☒ Yes ☐ No

2. State the total funds you estimate are necessary to construct and operate the requested facility for three months without revenue.

\$ 416,303.79

3. Identify each source of funds, including the name, address, and telephone number of the source (and a contact person if the source is an entity), the relationship (if any) of the source to the applicant, and the amount of funds to be supplied by each source.

Source of Funds (Name and Address)	Telephone Number	Relationship	Amount
Home Federal Trust Bank of Georgia 104 Green Street Gainesville, GA 30501 Attn: W. A. Gainey, V.P.	404/535-9600	Bank	\$425,000.00
The Applicant's principals are legally obligated to the guarantee of a loan up to \$425,000.00 for this facility.			

CERTIFICATE OF SERVICE

I, Adriana Escalante, a paralegal in the law firm of McFadden, Evans and Sill, do hereby certify that a true and correct copy of the foregoing "Staton's Opposition to Petition to Enlarge" was served, this 22nd day of July, 1993, via First Class United States Mail, postage prepaid, upon the following:

Honorable Richard L. Sippel
Administrative Law Judge
Federal Communications Commission
2000 L Street, N.W.
Washington, D.C. 20554
(Via Hand Delivery)

James Shook, Esquire
Hearing Branch, Enforcement Division
Federal Communications Commission
2025 M Street, N.W., Room 7212
Washington, D.C. 20554
(Via Hand Delivery)

Morton I. Berfield, Esquire
John J. Schauble, Esquire